

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION**

IN RE:	)	
	)	CHAPTER 7
LONA DEMETRIA CAROLYNN	)	
BIBBS-WALKER,	)	CASE NO. 20-11214-pmb
	)	
DEBTOR.	)	
	)	

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**NOTICE OF BANKRUPTCY RULE 2004 EXAMINATION**

To:

Lona Demetria Carolynn Bibbs-Walker  
193 Stanley Road  
Fayetteville, GA 30214

Sims W. Gordon, Jr., Esq.  
The Gordon Law Firm PC  
Suite 1500  
400 Galleria Parkway SE  
Atlanta, GA 30339

Mark A. Baker, the undersigned attorney, will examine Lona Demetria Carolyn Bibbs-Walker under oath on January 14, 2021, at 2:00 p.m., Eastern Time, via Zoom or similar remote teleconference. The examination may continue from day to day until completed, subject to the limitations of Bankruptcy Local Rule 2004-1. If the examinee receives this notice less than 7 days prior to the scheduled examination date, the examination will be rescheduled upon timely request to a mutually agreeable time.

This examination is pursuant to Bankruptcy Rule 2004 and Bankruptcy Local Rule 2004-1, and will be recorded by this method: video and audio transcription by certified court reporter. The scope of the examination shall be as described in Bankruptcy Rule 2004.

Pursuant to Local Rule 2004-1, this examination is by notice due to debtor's consent and no order shall be necessary.

XX Production: [The examinee or your representatives, must also bring with you to the examination the documents, electronically stored information, or objects described on the attached schedule (or if the examination of a witness other than the debtor, on the attached subpoena), and must permit inspection, copying, testing, or sampling of the materials.]

Dated: December 28, 2020.

Respectfully submitted,  
/s/ Mark A. Baker  
Mark A. Baker (GBN # 033840)  
Counsel for Movant  
McMICHAEL TAYLOR GRAY, LLC  
3550 Engineering Drive, Suite 260  
Atlanta, GA 30092  
Telephone: (404) 474-7149  
Facsimile: (404) 745-8121  
Email: mbaker@mtglaw.com

### **CERTIFICATE OF SERVICE**

I, Mark A. Baker, certify that I am over the age of 18 and that on December 28, 2020, I served a copy of the foregoing *NOTICE OF BANKRUPTCY RULE 2004 EXAMINATION* by first class U.S. Mail, with adequate postage prepaid on the following persons or entities at the address stated:

#### **Via U.S. Mail**

Lona Demetria Carolynn Bibbs-Walker  
193 Stanley Road  
Fayetteville, GA 30214

#### **Via Electronic Service and U.S. Mail**

Jonathan S. Adams, Esq.  
Office of the United States Trustee  
362 Russell Federal Building  
75 Ted Turner Drive, SW  
Atlanta, GA 30303

James G. Baker, Esq.  
305 North Greenwood Street  
LaGrange, GA 30240

Sims W. Gordon, Jr., Esq.  
The Gordon Law Firm PC  
Suite 1500  
400 Galleria Parkway SE  
Atlanta, GA 30339

Lynn L. Carroll  
Golder Law, LLC

101 Village Parkway  
Building 1, Suite 400  
Marietta, Georgia 30067

/s/ Mark A. Baker

Mark A. Baker

## SCHEDULE OF DOCUMENTS TO BE PRODUCED

### Definitions

1. "Agreement" means a contract, arrangement, or understanding, formal or informal, oral or written, between two or more persons.
2. "Any" means one or more.
3. "Communication" means any disclosure, transfer, or exchange of information or opinion, however made.
4. "Document" means any written, recorded, or graphic material of any kind, whether prepared by you or by any other person, that is in your possession, custody, or control. The term includes agreements; contracts; letters; telegrams; inter-office communications; memoranda; reports; records; instructions; specifications; notes; notebooks; scrapbooks; diaries; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; descriptions; drafts, whether or not they resulted in a final document; minutes of meetings, conferences, and telephone or other conversations or communications; invoices; purchase orders; bills of lading; recordings; published or unpublished speeches or articles; publications; transcripts of telephone conversations; phone mail; electronic-mail; ledgers; financial statements; microfilm; microfiche; tape or disc recordings; and computer print-outs.

The term "document" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term "document" includes all drafts of a document and all copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems), together with instructions and all other materials necessary to use or interpret such data compilations.

Without limitation on the term "control" as used in the preceding paragraph, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person.

5. "Identify" or "identity" means to state or a statement of:
  - a. in the case of a person other than a natural person, its name, the address of its principal place of business (including zipcode), its telephone number, and the name of its chief executive officer, as well as, if it has a person other than a natural person that ultimately controls it, that other person's name, the address of that person's principal place of business (including zipcode), that other person's telephone number, and the name of that other person's chief executive officer;
  - b. in the case of a natural person, his or her name, business address and telephone number, employer, and title or position;

c. in the case of a communication, its date, type (e.g., telephone conversation or discussion), the place where it occurred, the identity of the person who made the communication, the identity of the person who received the communication, the identity of each other person when it was made, and the subject matter discussed;

d. in the case of a document, the title of the document, the author, the title or position of the author, the addressee, each recipient, the type of document, the subject matter, the date of preparation, and its number of pages; and

e. in the case of an agreement, its date, the place where it occurred, the identity of all persons who were parties to the agreement, the identity of each person who has knowledge of the agreement and all other persons present when it was made, and the subject matter of the agreement.

6. "Including" means including, but not limited to.

7. "Person" means any natural person, corporation, company, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission, office or other business or legal entity, whether private or governmental.

8. "Relating to" means containing, constituting, considering, comprising, concerning, discussing, regarding, describing, reflecting, studying, commenting or reporting on, mentioning, analyzing, or referring, alluding, or pertaining to, in whole or in part.

9. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa; and the past tense shall include the present tense where the clear meaning is not distorted. The term "or" shall mean "and" and vice-versa, as necessary to bring within the scope of the following document requests all information or documents that would be excluded absent this definition.

10. "You," "your," "yours," "Debtor" refer to the Debtor in this bankruptcy case, Lona Demetria Carolyn Bibbs-Walker.

#### Instructions

1. Unless otherwise specified, the documents called for by these document requests are documents in your possession, custody or control that were applicable, effective, prepared, written, generated, sent, dated, or received at any time since January 1, 2020.

2. All documents that respond, in whole or in part, to any part or clause of any paragraph of these document requests shall be produced in their entirety, including all attachments and enclosures. Only one copy need be produced of documents that are responsive to more than one paragraph or are identical except for the person to whom it is addressed if you indicate the persons or group of persons to whom such documents were distributed.

3. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author,

addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

4. For any document responsive to these document requests which is known to have been destroyed or lost, or is otherwise unavailable, identify each such document by author, addressee, date, number of pages, and subject matter; and explain in detail the events leading to the destruction or loss, or the reason for the unavailability of such document, including the location of such document when last in your possession, custody, or control, and the date and manner of its disposition.

5. In responding to any document request that calls for documents relating to "any person," or "each person," include information or documents relating to your company, if applicable.

Subject to the preceding definitions and instructions, the documents and records which you are requested to produce are as follows:

1. A copy of the Operating Agreement, rules, regulations, procedures, and any amendments or proposed amendments thereto, of the Georgia Limited Liability Company, A Dental Home 4 Kidz Partnership, LLC.
2. A copy of each of your most current employee lists and organizational charts for A Dental Home 4 Kidz Partnership, LLC.
3. A copy of each annual or other periodic report for A Dental Home 4 Kidz Partnership, LLC.
4. All minutes, recordings, summaries, or reports of meetings, whether formal or informal, of the members of the board of directors or other governing body of A Dental Home 4 Kidz Partnership, LLC.
5. All documents that report, describe, summarize, analyze, discuss or comment upon the acquisition of all business equipment of every type located at the business premises of A Dental Home 4 Kidz Partnership, LLC in Fayetteville, Georgia, between January 1, 2020, and December 28, 2020.
6. A copy of all policies of insurance, including binders, endorsements, and declarations pages, relating to the business premises of My Kidz Dentist, LLC located at 1741 Newnan Crossing Blvd., Suite I, Newnan, GA 30265, in effect between January 1, 2020, and December 28, 2020.
7. All documents that report, describe, summarize, analyze, discuss or comment upon the nature of and any damage caused to the business premises of My Kidz Dentist, LLC,

located at 1741 Newnan Crossing Blvd, Suite I, Newnan, GA 30265, between January 1, 2020, and December 28, 2020.

8. A copy of all insurance claim notices provide by you or your agent(s) to the insurer, or its agent(s), related to the business premises of My Kidz Dentist, LLC, located at 1741 Newnan Crossing Blvd, Suite I, Newnan, GA 30265, between January 1, 2020, and December 28, 2020.
9. A copy of all insurance drafts and/or checks received by or on behalf of My Kidz Dentist, LLC, between January 1, 2020, and December 28, 2020, related in any way to the business premises of My Kidz Dentist, LLC, located at 1741 Newnan Crossing Blvd, Suite I, Newnan, GA 30265.
10. A copy of all insurance reports, including all photographs and any other documents, showing damage caused by flooding related to the business premises of My Kidz Dentist, LLC, located at 1741 Newnan Crossing Blvd, Suite I, Newnan, GA 30265.
11. The name, business address, and telephone number of the insurance adjuster employed by My Kidz Dentist, LLC, or its insurance carrier, to investigate and determine any claim related to the business premises of My Kidz Dentist, LLC, located at 1741 Newnan Crossing Blvd., Suite I, Newnan, GA 30265, between January 1, 2020, and December 28, 2020.
12. The name, business address, and telephone number of each contractor and subcontractor who performed services related to the business premises of My Kidz Dentist, LLC, located at 1741 Newnan Crossing Blvd., Suite I, Newnan, GA 30265, between January 1, 2020, and December 28, 2020, relating to any insurance claim for damages.